

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 02⁴-10027-PBS

MATTHEW VICKERS

AFFIDAVIT OF MATTHEW VICKERS IN SUPPORT OF
MOTION TO SUPPRESS

I, Matthew Vickers, having been previously sworn, do hereby
depose and state the following:

1. I am the defendant in the above-entitled matter

ARREST ON MAY 14, 2001

2. On May 14, 2001 at about 7:20 p.m. I was driving a Honda Civic on Monadnock St. in Dorchester at a normal rate of speed.
3. I saw an unmarked police cruiser with five officers in plain clothes in back of me.
4. The police put their blue lights on to stop me.
5. I took a left onto Dudley St., then a left onto Magnolia St., and then a right onto Magnolia Square.
6. I got out of the car and ran from the police
7. The police caught up with me and placed me under arrest
8. A few minutes later they produced a bag of cocaine that they said I dropped in the street.
9. I did not consent to search of my person nor was I shown a search warrant. I did not consent to any questioning.

ARREST ON OCTOBER 19, 2003

On October 19, 2003, I was driving a car along Normandy St. in Dorchester.

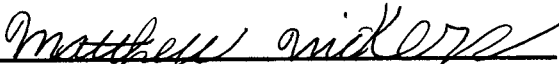
While driving, I noticed a police cruiser coming up from behind me with its lights on. I pulled over at the first available spot where I would not be blocking the street.

12. Instead of going by me, the police cruiser blocked me in.

Officers immediately removed me from the car, searched me, and questioned me. Moments later, they handcuffed me and put me in the back of a police cruiser.

14. I was not shown a search or arrest warrant. I did not consent to the officers' search of me, or to any questioning.
15. According to documents provided to me by my lawyers, the police say they found drugs at my feet after I was put in the cruiser.

I make this statement pursuant to the protections afforded by United States v. Simmons, 390 U.S. 377 (1968).


Matthew Vickers